

David H. Krieger, Esq.
Nevada Bar No. 9086
Shawn W. Miller, Esq.
Nevada Bar No. 7825
KRIEGER LAW GROUP, LLC
2850 W. Horizon Ridge Pkwy, Suite 200
Henderson, Nevada 89052
Phone: (702) 848-3855
dkrieger@kriegerlawgroup.com
smiller@kriegerlawgroup.com
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIAM BERRY, JR,

Plaintiff,

vs.

AARGON AGENCY, INC; PLUSFOUR, INC;
QUANTUM COLLECTIONS; AND
RICHLAND HOLDINGS, INC DBA
ACCOUNTCORP OF SOUTHERN NEVADA,

Defendants.

Case No.: 2:20-cv-02144-APG-EJY

**JOINT MOTION FOR EXTENSION OF
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT RICHLAND
HOLDINGS, INC. DBA ACCOUNTCORP
OF SOUTHERN NEVADA’S MOTION TO
DISMISS**

(First Request)

WILLIAM BERRY, JR (“Plaintiff”) and Defendant RICHLAND HOLDINGS, INC. DBA ACCOUNTCORP OF SOUTHERN NEVADA (“Richland”), collectively the “Parties”, hereby jointly submit this motion (“Joint Motion”) for an extension of time for Plaintiff to file a response to Richland’s Motion to Dismiss (“Motion to Dismiss”) to **January 13, 2021**. This is the same date Plaintiff’s response is due to Plus Four Inc.’s Motion to Dismiss. Additionally, Richland’s reply brief, if any, shall be extended to **February 10, 2021**, the same date Plus Four’s reply brief is due (Plus Four is another Defendant in this matter). Richland’s Motion to Dismiss was filed on December 22, 2020 and appears on the docket as ECF #13. Plaintiff’s current deadline to respond to Richland’s Motion to Dismiss is January 5, 2021.

The reason for the request is because of the holidays, counsel for Plaintiff needs additional time to communicate with Plaintiff about the issues raised in the Motion to Dismiss, and fully examine and respond to the arguments and legal analysis set forth in the Motion to Dismiss and evaluate whether dismissal or an amended pleading would resolve the issues raised in the Motion to Dismiss.

This is the Plaintiff's first request for an extension and this Joint Motion has not been submitted for the purpose of delay or other impermissible purpose. Richland will not be prejudiced by the delay and has agreed to the extensions of time. Additionally, the requested extension will not prejudice or directly affect the other Defendants in this case. Accordingly, it is requested that the Court grant the extension of time to respond to the Motion to Dismiss to January 13, 2021 and any reply brief to February 10, 2021.

Dated: January 5, 2021.

Submitted By:

No Opposition:

/s/ Shawn W. Miller

/s/ Jared M. Moser

David H. Krieger, Esq.
Shawn W. Miller, Esq.
KRIEGER LAW GROUP, LLC
2850 W. Horizon Ridge Pkwy., Suite 200
Henderson, Nevada 89052
Attorneys for Plaintiff

Chad F. Clement, Esq. (NSB 12192)
Jared M. Moser, Esq. (NSB 13003)
MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendant
Richland Holdings, Inc., dba AcctCorp of
Southern Nevada

ORDER GRANTING EXTENSION OF TIME

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: January 5, 2021